

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM S. KELLER	:	IN BANKRUPTCY
a/k/a Scott Keller	:	CHAPTER 13 PROCEEDING
d/b/a Scott's Towing	:	
Debtor	:	BK NO: 1-17-03059

**AMENDMENT TO BANKRUPTCY PETITION**

AND NOW, comes the Debtor, William S. Keller, by and through his attorney, Deborah A. Hughes, Esquire, of Schiffman, Sheridan & Brown, PC, who wishes to amend his Bankruptcy Petition as follows:

**Add the following assets to:**

Schedule B.33 - Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Counterclaim against Northeastern Motors, II	Asset:
	Unknown

Schedule B.33 - Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Claim against Douglas Gross	Asset:
probably not collectible as Douglas Gross is in	Estimate
state prison	\$45,000.00

Schedule B.53 - Do you have other property of any kind you did not already list

Debtor is in possession of two vehicles that are titled in the name of Northeastern Motors, II; a 2006 Mazda 3 and a 2002 Ford F350. These vehicles are part of a lawsuit previously listed on Schedule F; 4.15.

Respectfully submitted,

Date: 7/26/18

  
Deborah A. Hughes, Esquire  
Schiffman, Sheridan & Brown, PC  
2080 Linglestown Road, Suite 201  
Harrisburg, PA 17110  
(717) 651-1772

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In Re	:	IN BANKRUPTCY
WILLIAM S. KELLER	:	CHAPTER 13 PROCEEDING
a/k/a Scott Keller	:	
d/b/a Scott's Towing	:	
Debtor	:	BK NO: 1-17-03059

**VERIFICATION**

I, William S. Keller, Debtor herein, do hereby verify that I have read the foregoing Amendment to the Bankruptcy Petition, and that it is true and correct to the best of my knowledge, information and belief.

/s/ \_\_\_\_\_  
William S. Keller

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Debtor	:	BK NO: 1-17-03059

**CERTIFICATE OF SERVICE**

On this, the 26<sup>th</sup> day of July, 2018, I, Deborah A. Hughes, Esquire, do hereby certify that a true and correct copy of the foregoing AMENDMENT TO BANKRUPTCY PETITION was served by depositing same in first-class U.S. mail, postage prepaid and/or via electronic mail, to the following:

Charles J. DeHart, Esquire  
Trustee  
8125 Adams Drive #A  
Hummelstown, PA 17036

  
Deborah A. Hughes, Esquire